

# MEMO ENDORSED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GUOTAIQIXING BIOMEDICAL  
INTERNATIONAL (S) PTE. LTD.,

Plaintiff,

v.

XUEFENG DAI

Defendant.

Defendants are directed to file their opposition by June 11, 2024, and Plaintiff is directed to file their reply by June 18, 2024. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 5/28/24

New York, New York

Civil Action No. 24-cv-03142 (ER)

## NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiff Guotaiqixing Biomedical International (S) Pte. Ltd. (“GTQX”) moves under 28 U.S.C. § 1447(c) to remand this action to the Supreme Court of the State of New York, New York County, where it was originally filed, and for an award of attorneys’ fees and costs.

In support of this motion, GTQX submits the accompanying Memorandum of Law, and the Declaration of Benjamin Bloodstein, Esq. and exhibits attached thereto (“Bloodstein Decl.”).

As further explained in its Memorandum of Law, GTQX files this Notice of Motion rather than a letter motion for pre-motion conference because GTQX believes that delay may result in the loss of a right. *See* Individual Practices of Judge Edgardo Ramos at 2.A.ii. Specifically, GTQX has recently learned that, only five days after Defendant Xuefeng Dai removed this state-law action to recognize and enforce a foreign judgment, Dai sold property in Florida in flagrant violation of that same foreign judgment, which included an order freezing Dai’s assets. *See* Bloodstein Decl. ¶ 13. Dai’s undisclosed sale of the Florida property is only the latest in a pattern of bad faith conduct meant to forestall GTQX’s recovery. *See Id.* ¶ 7. Dai’s groundless removal of this action

was clearly intended to delay enforcement of the foreign judgment while Dai flagrantly violates the freeze order. Further delay of this action will prejudice GTQX by preventing it from enforcing the judgment and order until it is too late.

Dated: May 24, 2024

NORTON ROSE FULBRIGHT US LLP

By: /s/ Benjamin D. Bloodstein

Benjamin D. Bloodstein  
1301 Avenue of the Americas  
New York, New York 10019  
Tel: (212) 318-3000  
Fax: (212) 318-3400  
benjamin.bloodstein@nortonrosefulbright.com

Brian A. Sun (*pro hac vice forthcoming*)  
Christopher Pelham (*pro hac vice forthcoming*)  
555 South Flower Street  
Forty-First Floor  
Los Angeles California 90071  
Tel: (213) 892-9200  
brian.sun@nortonrosefulbright.com  
christopher.pelham@nortonrosefulbright.com

*Attorneys for Plaintiff Guotaiqixing  
Biomedical International (S) Pte. Ltd.*